

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE:           SLABBED NEW MEDIA, LLC  
Debtor**

**CHAPTER 11  
CASE NO. 15-50963-KMS**

**NOTICE**

PLEASE TAKE NOTICE that Slabbed New Media, LLC (the "Debtor") has filed a Motion to Extend Exclusivity (the "Motion"), a copy of which is attached hereto as Exhibit "A" and incorporated herein by reference.

PLEASE TAKE FURTHER NOTICE that all creditors and parties-in-interest wishing to object to the Application must file a written objection or other responsive pleading within 21 days from and after the date of this Notice, with the Clerk of the Court, Danny L. Miller, United States Bankruptcy Court, Southern District of Mississippi, Gulfport Division, at Dan M. Russell, Jr., U. S. Courthouse, 2012 - 15<sup>th</sup> Street, Ste. 244, Gulfport, MS 39501, with a copy to Craig M. Geno, Esq., counsel for the Debtors, at the Law Offices of Craig M. Geno, PLLC, 587 Highland Colony Parkway, Ridgeland, MS 39157.

This, the 19<sup>th</sup> day of December, 2015.

Respectfully submitted,

SLABBED NEW MEDIA, LLC

By Its Attorneys,  
LAW OFFICES OF CRAIG M. GENO, PLLC

By: 

Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793  
Jarret P. Nichols; MSB No. 99426  
LAW OFFICES OF CRAIG M. GENO, PLLC  
587 Highland Colony Parkway  
Ridgeland, MS 39157  
601-427-0048 - Telephone  
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IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: SLABBED NEW MEDIA, LLC CHAPTER 11  
Debtor CASE NO. 15-50963-KMS

MOTION TO EXTEND EXCLUSIVITY

COMES NOW Slabbed New Media, LLC (the "Debtor"), and files this its *Motion to Extend*

*Exclusivity* (the "Motion"), and in support thereof, would show unto the Court the following, to-wit:

1. The Disclosure Statement and Plan of Reorganization are currently due on December 14, 2015.

2. Subsequent to the entry of the scheduling order establishing December 14, 2015, as the deadline for the filing of the Disclosure Statement and Plan of Reorganization, additional claims have arisen directly and indirectly against the Debtor and its principal, Douglas Handshoe.

3. Debtor is obligated to indemnify Mr. Handshoe for claims filed against him arising out of his functioning as an employee and manager of the Debtor.

4. It is Debtor's present intent to intervene in certain claims brought, on an indirect basis, that have been filed both against and by Mr. Handshoe.

5. However, Debtor has not yet engaged Louisiana counsel to assist in those endeavors, nor has it removed certain claims or causes of action to this Court that it intends to remove. The filing of a Disclosure Statement and Plan at this stage would be premature and a waste of estate assets, costs and expenses.

6. Debtor estimates that it will be approximately sixty (60) days before the interventions and removals have been filed and requests sixty (60) days within which to file its Disclosure Statement and Plan.

7. Other grounds to be assigned upon a hearing hereof.

WHEREFORE, PREMISES CONSIDERED, Debtor respectfully requests that the Court will grant the Motion and extend the deadline for filing the Disclosure Statement and Plan of Reorganization for sixty (60) days. Debtor prays for general relief.

This, the 14<sup>th</sup> day of November, 2015.

Respectfully submitted,  
SLABBED NEW MEDIA, LLC  
By Its Attorneys,  
LAW OFFICES OF CRAIG M. GENO, PLLC

By: Craig M. Geno  
Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793  
Jarret P. Nichols; MSB No. 99426  
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cmgeno@cmgenolaw.com  
jnichols@cmgenolaw.com  
\*From Court User Group/Slabbed New Media Handshoe Exclusivity Lit Motion.wpd

CERTIFICATE OF SERVICE

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via Notice of Electronic Filing, a true and correct copy of the above and foregoing instrument to:

Christopher J. Steiskal, Esq.  
Office of the United States Trustee  
christopher.steiskal@usdoj.gov

This, the 14<sup>th</sup> day of December, 2015.

Craig M. Geno  
Craig M. Geno

